

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 21 CR 05 (BHL)

v.

JOHN D. WHELAN and
TINA MONTEZON,

Defendants.

**GOVERNMENT’S MOTION FOR ENTRY OF A PROTECTIVE ORDER GOVERNING
DISCOVERY**

The United States of America, by United States Attorney Matthew D. Krueger and Assistant United States Attorneys Julie Stewart and Kevin Knight, hereby moves under Rule 16(d)(1) of the Federal Rules of Criminal Procedure for a protective order regulating the dissemination of discovery material in this case

1. The indictment in this case charges the defendants with conspiracy to distribute controlled substances, unlawful distribution of controlled substances, maintaining a drug-involved premises, and making false statements to federal agents in violation of Title 21, United States Code, Sections 846, 841(a)(1), 841(b)(1)(C), 856(a)(1) and Title 18, United States Code, Section 1001.

2. The discovery to be provided by the government in this case includes individuals’ personal identifying information (“PII”) whose unrestricted dissemination could adversely affect

the privacy interests of third parties. The PII includes Social Security numbers, dates of birth, and addresses, as well as the personal health information of third parties.

3. When discovery contains only limited PII and the PII is not relevant to the case, the government generally redacts the PII from the discovery. In this case, however, there is a substantial amount of PII in the discovery and some of the PII (such as personal health information) is relevant evidence.

4. The United States worked with defendants' counsel to draft the proposed protective order. The defendants have no objection to the entry of the proposed protective order.

The government respectfully moves this Court to enter the proposed protective order.

Respectfully submitted this 5th day of February, 2021 at Milwaukee, Wisconsin.

MATTHEW D. KRUEGER
United States Attorney

By: /s JULIE F. STEWART
Julie F. Stewart (IL Bar No. 6304085)
Kevin Knight (IL Bar No. 6309449)
Assistant United States Attorneys
Attorneys for Plaintiff
Office of the United States Attorney
517 East Wisconsin Avenue, Room 530
Milwaukee, Wisconsin 53202
Telephone: (414) 297-1700
Fax: (414) 297-1738
Email: Julie.Stewart@usdoj.gov
Kevin.Knight@usdoj.gov